

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

XIAOTIAN LIU,

Plaintiff,

V.

KRISTI NOEM,
in her official capacity as the Secretary of
Homeland Security,
et al.,

Defendants.

No. 1:25-cv-00133-SE-TSM

CONSENT MOTION FOR EXTENSION OF TIME

Defendants, through undersigned counsel, hereby submit this Consent Motion for Extension of Time to respond to Plaintiff's Complaint, ECF No. 1, by thirty (30) days from July 30, 2025, to August 29, 2025.

On April 4, 2025, Plaintiff commenced the instant action, ECF No. 1. This Court has previously granted two unopposed motions to extend Defendants' deadline to answer or otherwise respond to the complaint. Defendants' current deadline to answer or otherwise respond is July 30, 2025. The parties have been engaged in conversations to resolve this matter without further litigation. Counsel for Plaintiffs will be on leave during the week of July 21, 2025. Thus, Defendants now respectfully request a further thirty-day extension of their deadline to answer or otherwise respond to the complaint, which Plaintiff does not oppose, in order to continue to discuss potential resolution of this matter.

Defendants submit that they are not requesting an extension for the purpose of undue delay and that the extension will not prejudice either party. Good cause, therefore, supports this consent

motion requesting a thirty (30) day extension of time. Accordingly, Defendants request that the Court extend Defendants' deadline to answer or otherwise respond to Plaintiff's Complaint from July 30, 2025, to August 29, 2025.

Dated: July 18, 2025

Respectfully submitted,

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By : *s/ Alessandra Faso*
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CERTIFICATE OF SERVICE

I certify that on July 18, 2025, electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will provide electronic notice and an electronic link to this document to all attorneys of record:

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